

REMARKS/ARGUMENTS

The Office Action dated December 29, 2006 has been received and duly noted. A two month extension request is enclosed. The last filed claim has been renumbered as Claim 24 and depends upon Claim 23 to overcome the claim objection noted by the Examiner.

The originally filed claims were rejected as being anticipated by Edwards 6,053,252. Applicant submits that the originally filed claims are distinguishable from Edwards, and has amended the claims to improve clarity. More particularly, the invention as recited in Claim 1 relates to a workover system with a lower end of an annulus line connected to a lateral port in the subsea horizontal tree for communication with the annulus. The Examiner contends that the annulus line of Edwards is connected at 70 for communication with the annulus, but 70 of Edwards is a gate valve and is not a port. The valve 70 of Edwards controls flow to the annulus along a flowpath internal of the housing 26a, but Edwards neither discloses nor suggests a lateral port in the subsea horizontal tree for communication with the annulus, i.e., a port passing laterally through a wall of the tree. Claim 4 has been amended to be consistent with the amendments to Claim 1. Claims 5 and 6 have been cancelled. Claim 7 has been amended to improve clarity.

Independent Claim 10 was also considered anticipated by the Examiner. Claim 10 as amended is clear that the annulus line passes laterally through one of the adaptor and horizontal tree for communication with the annulus. Figure 1 of the present application thus shows a lateral line passing through the adaptor,

and Figures 2, 3, and 4 show a lateral port passing through the horizontal tree. Edwards discloses no such lateral port through either the adaptor or the horizontal tree for communication with the annulus. Claim 14-16 have been amended to improve clarity.

Independent Claim 18 was also rejected as being anticipated by Edwards. Claim 18 as amended calls for an annulus line to be connected to the lateral port for communication with the annulus, the lateral port being formed in the horizontal tree at a position below the tree cap. The claim is clearly distinguishable from Edwards, which does not disclose a lateral port formed in a horizontal tree at a position below the tree cap. Dependant Claims 19 and 21 have been amended to improve clarity.

Independent Claim 23 has been amended to clearly recite that at least one valve is positioned external to and supported from the subsea horizontal tree or positioned within the tubing hangar, and also that the riser comprises an internal diameter substantially equal to the internal diameter of the tubing hangar. The Examiner indicated that Edwards discloses a valve 70, but this valve is not supported on the horizontal tree or the tubing hangar, as recited in Claim 23 of the present invention. Moreover, the riser as disclosed in Edwards does not have an internal diameter substantially equal to the internal diameter of a production tubing string supported by the tubing hangar. In Edwards, the production tubing string is substantially restricted compared to the diameter through the riser 36. It is a significant feature of the invention, as disclosed at page 10, commencing at line 11 of the present application, that the isolation

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sleeve provides flow bore access from the riser ID to the production tubing string for fluid flow or for other purposes. Applicant's previously submitted Claim 23 has been renumbered as Claim 24, and now depends upon Claim 23. New Claims 25 and 26 have been added.

In view of the above, early allowance of the application is requested.

Respectfully submitted,



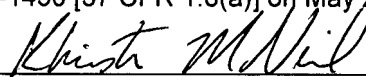
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I certify that this document is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450 [37 CFR 1.8(a)] on May 24, 2007.



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